

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

MOTION TO ENLARGE TIME FOR FILING OF
GOVERNMENT'S RESPONSE TO DEFENDANT'S MOTION FOR DISCOVERY

The United States of America, by Michael J. Sullivan, United States Attorney for the District of Massachusetts, James R. Goodhines, Special Assistant United States Attorney, and counsel for the defense hereby file their assented to motion to enlarge time for filing of government's response to defendant's motion for discovery from August 13, 2004 until August 27, 2004. The parties rely on the following in support thereof.

The defendant requested confirmation of the confidential informant, and was given until July 29, 2004 to file discovery motions. The defendant served the government with the copy of his motion on August 12, 2004. The government's original response date was set by the Court, Neiman, J., at August 13, 2004. Since the defendant filed his discovery motions past the original filing date, the government needs additional time to respond to the defendant's motion. The defendant, through his attorney, consents to this motion requesting additional time to

respond to his motion. This request does not cause undue delay, and is in the interests of justice.

Respectfully submitted,

MICHAEL J. SULLIVAN
United States Attorney

By:

James R. Goodhines
JAMES R. GOODHINES
Special Asst. U.S. Attorney

/s/
VINCENT BONGIORNI, Esq.
Counsel for Defendant

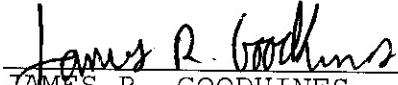
Date: August 17, 2004

CERTIFICATE OF SERVICE

Hampden, ss.

Springfield, Massachusetts
August 17, 2004

I, James R. Goodhines, Special Assistant U.S. Attorney, do hereby certify that I have served, by first class mail, a copy of the foregoing, to counsel of record.



JAMES R. GOODHINES
Special Asst. U.S. Attorney

Date: August 17, 2004